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Attorneys for Defendant  
ROBERT CHARLES CRIST

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-cr-00229-DJC
	)	
Plaintiff,	)	STIPULATION AND [ <del>PROPOSED</del> ] ORDER TO
	)	ADOPT AMENDED LANGUAGE FOR SPECIAL
vs.	)	CONDITIONS OF RELEASE # 2
	)	
ROBERT CHARLES CRIST	)	Date: July 21, 2023
	)	Time: 2:00 P.M.
Defendant.	)	Judge: Hon. Allison Claire
	)	
	)	

Following the court hearing on the defendant's Motion to Modify Conditions of Release (CR 48, 51), IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, U.S. Attorney Phillip A. Talbert, through Assistant United States Attorney Emily Sauvageau, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hannah Labaree, attorney for defendant Robert Charles Crist, that the following language amending Special Condition #2 be adopted. The proposed language is in **bold**.

Pretrial Services Officer Stephanie Mott concurs in this request.

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1 You must not possess, have in your residence, or have access to a  
2 firearm/ammunition, destructive device, or other dangerous weapon;  
3 additionally, you must provide written proof of divestment of all  
4 firearms/ammunition currently under your control. **One exception to this**  
5 **condition is that the defendant is permitted to possess the following**  
6 **archery equipment: one “Mathews Switchback” compound bow and**  
7 **one “Xpedition Escape” compound bow, as well as a maximum of 12**  
8 **arrows. This equipment must be stored securely in a designated place**  
9 **in the defendant’s home, as approved by Pretrial Services. The**  
10 **equipment may be removed only for use when hunting and must be**  
11 **returned as soon as possible upon the completion of its use in a hunting**  
12 **expedition. The equipment must never be left outside of the designated**  
13 **place in the defendant’s home or, while in transit to and from a**  
14 **hunting expedition, must never be left unattended in a vehicle.**

11 Respectfully submitted,

12 Dated: July 21, 2023

HEATHER E. WILLIAMS  
Federal Defender

14 /s/ Hannah Labaree  
HANNAH LABAREE  
Assistant Federal Defender  
Attorney for Defendant  
Robert Charles Crist

17 Dated: July 21, 2023

PHILLIP A. TALBERT  
United States Attorney

19 /s/ Emily Sauvageau  
EMILY SAUVAGEAU  
Assistant U.S. Attorney  
Attorney for Plaintiff

22 ORDER

23 IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties’  
24 stipulation, and good cause appearing therefore, adopts the parties’ stipulation in its entirety as  
25 its Order. The proposed language amending Special Condition #2 is hereby adopted.

26 Dated: July 21, 2023

27 Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE